

Jason D. Guinasso (SBN# 8478)
5371 Kietzke Lane
Reno, NV 89511
775.853.8746
guinassolaw@gmail.com

Benjamin W. Bull*
Peter A. Gentala (*admitted pro hac vice*)
Dani Bianculli Pinter*
Christen M. Price (*admitted pro hac vice*)
Victoria Hirsch (*admitted pro hac vice*)
NATIONAL CENTER ON SEXUAL
EXPLOITATION
1201 F Street NW, Suite 200
Washington, DC 20004
202.393.7245
lawcenter@ncose.com

* *Pro Hac Vice applications forthcoming*
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JANE DOE,

Plaintiff,

vs.

JOSEPH LOMBARDO, Governor of Nevada, in
his official capacity; AARON FORD, Attorney
General of Nevada, in his official capacity; NYE
COUNTY; ELKO COUNTY; STOREY
COUNTY; WESTERN BEST, INC., D/B/A
CHICKEN RANCH; WESTERN BEST, LLC;
DESERT ROSE CLUB, LLC; HACIENDA
ROOMING HOUSE, INC. D/B/A BELLA'S
HACIENDA RANCH; MUSTANG RANCH
PRODUCTIONS, LLC D/B/A MUSTANG
RANCH LOUNGE, LLC; LEONARD 'LANCE'
GILMAN, in his official capacity; and LEONARD
'LANCE' GILMAN, in his individual capacity,

Defendants.

Case No.: 3:24-cv-00065-MMD-CSD

**DECLARATION OF
CHRISTEN M. PRICE IN SUPPORT
OF PLAINTIFF'S REQUEST FOR
ENTRY OF DEFAULT AGAINST
HACIENDA ROOMING HOUSE,
INC., D/B/A BELLA'S HACIENDA
RANCH**

1 The undersigned, Christen M. Price, Esq., declares under penalty of perjury that the
2 following assertions are true and correct:

3 1. I am a resident of the District of Columbia, Washington, and am over 18 years old. I
4 am a lawyer in good standing licensed to practice law in the District of Columbia, Washington,
5 and have been admitted by *pro hac vice* to practice in the State of Nevada relative to this particular
6 case.

7
8 2. I am a senior attorney with the National Center on Sexual Exploitation, which
9 represents Jane Doe in this matter.

10 3. I have personal knowledge of the facts set forth in this declaration.

11 4. On February 8, 2024, Plaintiff filed her initial complaint and summons.

12 5. On April 9, 2024, Defendant Hacienda Rooming House, Inc., d/b/a Bella's Hacienda
13 Ranch was served with the Complaint.

14 6. A responsive pleading to the initial complaint was due to be filed on or before April 30,
15 2024. No responsive pleading was filed.

16 7. More than twenty-one (21) days, exclusive of the day of service of the complaint have
17 expired since service on Defendant Hacienda Rooming House, Inc., d/b/a Bella's Hacienda Ranch.

18 8. Defendant Hacienda Rooming House, Inc., d/b/a Bella's Hacienda Ranch did not
19 request an extension of time to respond.

20 9. As of today's date, Defendant Hacienda Rooming House, Inc., d/b/a Bella's Hacienda
21 Ranch has failed to answer, defend, or otherwise plead in the matter.

22 I declare under penalty of perjury that the foregoing is true and correct.

23
24 Dated: August 29, 2024

/s/ Christen M. Price
Christen M. Price
Admitted by pro hac vice
Attorney for Plaintiff

ELECTRONIC CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 29th day of August, 2024, a true and correct copy of the foregoing **DECLARATION OF CHRISTEN M. PRICE IN SUPPORT OF PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST HACIENDA ROOMING HOUSE, INC., D/B/A BELLA'S HACIENDA RANCH** was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List.

/s/ Jennifer Johnson

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 29th day of August, 2024, a true and correct copy of the foregoing **DECLARATION OF CHRISTEN M. PRICE IN SUPPORT OF PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST HACIENDA ROOMING HOUSE, INC., D/B/A BELLA'S HACIENDA RANCH** was sent via first class mail, postage prepaid, to Defendant Hacienda Rooming House, Inc., d/b/a Bella's Hacienda Ranch, Attn: Registered Agent, Bella Shauna Cummins, 623 8th Street, Wells, NV 89835.

/s/ Jennifer Johnson